

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN

Plaintiff

V

McCONNELL VALDES, LLC;
ANTONIO A. ARIAS-LARCADA, ET AL

Defendants

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CIVIL NO.: 24CV01136

EXHIBIT A

DR. JAME S. STONE'S MEDICAL
CERTIFICATION

JAMES S. STONE, MD

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To: Whom it may concern

Date: 1/14/25

Re: Alan Goldman

Date of birth: 3/26/58

The above-named individual has been under my psychiatric and medical care since 2002 following his initial diagnosis of metastatic cancer. Over the years his medical conditions have evolved. One of his primary diagnoses includes severe posttraumatic stress disorder. In 2002, he had a total right nephrectomy and partial cystectomy. In 2016, he had recurrent cancer requiring further partial cystectomy and prostate resection. In early 2018, Mister Goldman suffered from a relatively rare resorption syndrome involving his right maxilla requiring emergency surgery. His immune system is thusly compromised and makes him susceptible to infectious diseases. His medical condition has exacerbated his already severe posttraumatic stress disorder. More recently he has been diagnosed with some impairments caused by a mild multi-infarct dementia. This has caused periods of confusion, short-term memory problems, and exacerbation of his PTSD and panic disorder.

Mister Goldman's severe PTSD coupled with his compromised immune system has been significantly exacerbated in the context of the Covid-19 pandemic. He now experiences intense Agoraphobia and frequent panic attacks especially in crowded settings making it nearly impossible for him to leave his home without significant emotional and physical distress. For the past 5 years, Mister Goldman has lived in near total isolation due to a well-founded fear of contracting Covid 19, which poses a threat to his already fragile health. He reports avoiding public transportation, airplanes, buses, churches, temples, restaurants, and all public gathering places since the onset of the pandemic. Mister Goldman's fears are both rational and medically justified.

To ensure Mister Goldman's ability to testify safely while protecting his health and life, I recommend that all legal proceedings occur in Vermont. Mister Goldman's medical conditions including his compromised immune system, severe PTSD, and debilitating Agoraphobia render travel beyond his medical support system inadvisable and potentially life-threatening. Remaining in Vermont ensures that he has immediate access to his trusted medical support team, who possess detailed knowledge of his complex medical history and can provide urgent care in the event of an emergency.

In my professional opinion, it is important that Mister Goldman's legal proceedings be held in Vermont to safeguard his well being and allow him to participate safely with the assurance that his medical needs will be promptly and appropriately addressed. I thank you for your consideration in this serious matter.

A handwritten signature in black ink, appearing to read "J. S. Stone". The signature is stylized, with the first letters of the first and last names being capitalized and prominent.

J. S. Stone, MD